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8-26-2024

NPDES and SDS General Feedlot Permit Changes

The usage of manure on our farm is pivotal to the sustainability of our cropping system. As our manure is such a valuable resource, we take large strides to place every gallon on the right acre. We have a saying, "Place it on the right acre, at the right time and you'll get great results. We do numerous soil tests, cost benefit analysis, and consult our agronomist as to the placement of manure. The directed usage of manure allows us to drastically reduce the amount of commercial fertilizers we have to use to grow our corn and soybeans. Then we feed the corn and soybeans to the pigs as part of a sustainable cycle that is great for the environment. We only apply the manure to land that needs the fertilization and sometimes we spend great amounts of money having to truck and pump our manure to our fields that haven't had an application for many years.

We have concerns about the added costs when it comes to your new regulations. Planting a cover crop within 14 days of manure application is a waist of resources, adds more greenhouse gases from the application, reduces soil health from another disturbance to the soil structure, and the cover crop won't be able to get established and will rot in the soil.

Nitrogen runoff is a problem in the Karst region. However, forcing a farmer to apply commercial fertilizer next to sink holes is counterproductive. Commercial fertilizer is proven to leach into the ground water faster than a properly applied manure fertilizer. The permit should allow for closer applications of manure as a sustainable, stable fertilizer and to rely less on commercials.

By restricting more application time in the fall and forcing spring application of manure introduces more problems than it is a viable solution. It will become a challenge for the manure hauling industry to complete the necessary applications so everyone can empty their pits and lagoons in the fall and the spring. If the pits and lagoons aren't able to be emptied, there is a very large chance that there will be more spill events. The economics of an application will become more expensive and add more hurdles to a struggling business. Spring applications are also very bad for the environment. A spring application of manure increases the chance for runoff of manure and soil into the ground water

because you are adding more water into already saturated spring melt off conditions. There is more compaction to the soil from the applicators, decreasing soil structure and soil health. There is also less time in the spring for timely applications.

Our profession, as farmers, is here to work hand and hand with nature and the environment. We want good water quality. We are here for the future. We recognize that the sustainability of our industry and our lively hoods rests in your hands. Please don't make it harder for us and our families to make a living while protecting the environment. Please allow for Best Management Practices for each situation, not a one size fits all approach to manure application.

Thank you for considering our comments and suggestions.

Thank you,

Todd Selvik